

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

THE LOCAL SPOT, INC., <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:20-cv-00421
)	Judge Richardson
JOHN COOPER, <i>et al.</i>,)	Magistrate Judge Newbern
)	
Defendants.)	

TOOTSIE'S ENTERTAINMENT, LLC)	
d/b/a TOOTSIE'S ORCHID LOUNGE,)	
<i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:21-cv-00501
)	Judge Richardson
JOHN COOPER, in his official)	Magistrate Judge Newbern
capacity as Mayor of Metropolitan)	
Nashville-Davidson County, <i>et al.</i>,)	
)	
Defendants.)	

JOINT STATUS REPORT ON STATE COURT PROCEEDINGS

In accordance with the Court's orders (Doc. Nos. 212, 213), the parties submit this status report of the state court proceedings. A case management conference was held on January 25, 2023. The following deadlines were imposed:

1. February 15, 2023: Supplemental Discovery Responses from Kid Rock's, Honky Tonk Central, Rippy's, and Jackson's Old Hickory Country Club ("State-Court Defendants")
2. March 2, 2023: Case Management Conference
3. April 15, 2023: Tenn. R. Civ. P. 30.02(6) Depositions of State-Court Defendants

In the coming weeks, the parties will be taking steps to finalize written discovery and

schedule depositions to comply with these deadlines.

The parties' next status report will be filed by April 1, 2023.

Respectfully submitted,

DEPARTMENT OF LAW OF THE
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
WALLACE W. DIETZ (BPR No. 9949)
DIRECTOR OF LAW

/s/ Melissa Roberge

ALLISON L. BUSSELL (BPR No. 23538)

ASSOCIATE DIRECTOR OF LAW

MELISSA ROBERGE (BPR No. 26230)

SENIOR COUNSEL

MICHAEL R. DOHN (BPR No. 37535)

ASSISTANT METROPOLITAN ATTORNEY

Metropolitan Courthouse, Suite 108

P.O. Box 196300

Nashville, Tennessee 37219

(615) 862-6341

allison.bussell@nashville.gov

melissa.roberge@nashville.gov

michael.dohn@nashville.gov

*Counsel for the Metropolitan Government
Defendants*

/s/ Kirk L. Clements

KIRK L. CLEMENTS (BPR No. 20672)

105 Broadway, Ste. 2

Nashville, Tennessee 37201

(615) 964-8000

(615) 953-1902

kirk@kirkclementslaw.com

/s/ James Bryan Lewis

JAMES BRYAN LEWIS (BPR No. 15116)

1300 Division St., Suite 307

Nashville, Tennessee 37203

(615) 256-2602

(615) 242-5967 (fax)

bryan@bryanlewislaw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served via the CM/ECF electronic filing system to:

Kirk L. Clements
105 Broadway, Ste. 2
Nashville, TN 37201

James Bryan Lewis
1300 Division St., Suite 307
Nashville, TN 37203

William L. Harbison
Lisa K. Helton
Christopher C. Sabis
Hunter C. Branstetter
Sherrard Roe Voigt & Harbison, PLC
150 3rd Avenue South, Suite 1100
Nashville, TN 37201

on this 30th day of January 2023.

/s/ *Melissa Roberge*
Melissa Roberge